

UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

RAYMOND WARE,

Plaintiff,

vs.

SIDNEY HAYAKAWA, Director of
Transportation Security Administration-
Honolulu, KEN KAMAHELE, Deputy Director,
Transportation Security Administration-
Honolulu; TRANSPORTATION SECURITY
ADMINISTRATION; MICHAEL CHERTOFF,
SECRETARY, Department of Homeland
Security; U.S. DEPARTMENT OF
HOMELAND SECURITY; JOHN DOES 1-5

Defendant.

Case No. CV:04-00671-HG-LEK

DECLARATION OF ALLISON VASPER

I, Allison Vasper, make the following declaration in lieu of an affidavit, as permitted by Section 1746 of Title 28 of the United States Code. I am aware that this declaration will be filed with the United States District Court for the District of Hawaii and that it is the legal equivalent of a statement under oath.

1. Presently, I am the Human Resources Specialist for the Transportation Security Administration (TSA) in the Honolulu International Airport (HNL) in Honolulu, Hawaii. My office is responsible for the maintenance of local personnel records for employees of HNL. The information contained herein is based on information gathered from the personnel record system maintained at HNL.

2. I have reviewed the local personnel folder for Richard Kidani and have confirmed that Mr. Kidani was removed from the Agency effective April 13, 2004 as a result of his failure to pass the recertification process.

I have read the above pages, and I declare under penalty of perjury that the information stated there is true and correct to the best of my knowledge.

Executed on September 6, 2006


ALLISON VASPER